

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK
BUFFALO DIVISION**

ERIE COUNTY MEDICAL CENTER
CORPORATION, *et al.*,

Plaintiffs,

Case No.: 1:21-cv-00826-WMS

v.

TEVA PHARMACEUTICALS USA,
INC., *et al.*,

Defendants.

**NOTICE OF MOTION AND MOTION FOR TEMPORARY STAY OF PROCEEDINGS
PENDING ANTICIPATED TRANSFER TO MULTIDISTRICT LITIGATION**

Walmart Inc. and Wal-Mart Stores East, LP (collectively, “Walmart”), by its undersigned attorneys, will move at a date and time to be established by the Court, for an Order temporarily staying all proceedings before this Court pending the Judicial Panel on Multidistrict Litigation’s final decision regarding whether to transfer this case to the Multidistrict Litigation pending before the Honorable Dan A. Polster of the United States District Court for the Northern District of Ohio.

In support of the motion, Walmart relies on the accompanying Memorandum of Law in support of Motion for Temporary Stay of Proceedings Pending Anticipated Transfer to Multidistrict Litigation, the declaration of James W. Carlson, the exhibits attached thereto, and all the pleadings and proceedings in this action.

Please take further notice that Walmart intends to file and serve reply papers.

DATED: August 4, 2021

Respectfully submitted,

/s/ James W. Carlson

James W. Carlson

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** denotes national counsel who will seek pro
hac vice admission*

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